



Submission to MBIE NZ – due 13 December 2019 5pm

From: Independent Audiologists NZ (IANZ)

**Re: Consultation on ACC regulated payments – for
Hearing Loss treatment**

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EXECUTIVE SUMMARY

1) IANZ suggests that MBIE treat Audiologists fairly and increase our fees as a recovery one-off by adding 6 years' worth of CPI (let's say 12% based on CPI 2014-anticipated 2020) and then have us put onto the same proposed biennial fees adjustment schedule as all other Professions covered by ACC Treatment regulations.

2) IANZ believes that Audiologists, Optometrists and Dentists are unique in the amount of expensive equipment and IT required to provide our services to Professional standards. These occupations deserve to be grouped together in any proposed split of Professions, with fees adjusted upwards to reflect the greater operational overhead costs of these groups.

Introduction

IANZ represents a NZ wide group of individual clinic owners, who are all professionally trained audiologists and full members of NZ Audiological Society.

IANZ members choose to operate in a patient-centred manner, and do not receive commissions based on sales. We operate free from the potential for conflict of interest faced by Audiologists working within manufacturer-owned or associated practices. While the corporate audiology is mainly represented by the Hearing Industry Association (HIA), IANZ is entirely composed of practicing audiologists who are active health professionals.

In the only independent survey of satisfaction from service users in NZ Audiology care (ACC 2015), the independent clinics scored more highly than the corporate run or associated clinics.

Question 1

MBIE is proposing for Audiologists a 2.05% treatment fee increase – in line with other health Professions. It is, however, the first fee increase suggested for Audiologists since 1.7. 2014 and yet other Professions have had annual reviews and fees changes based on annual inflation index (CPI).

This difference between audiologists and other treatment providers has no place within any fair and adequate funding of the health Professionals carrying out service to ACC claimants.

Independent clinics do not have the ability to continually absorb general cost increases without increasing fees. Unlike manufacturer-owned clinics, the independent clinics have no fat in the wholesale price they have to pay to manufacturers to purchase the aids for claimants they care for.

Independent clinics are full tax payers within NZ, as, unlike corporate-owned clinics, they have no ability to transfer profit offshore without first paying correct NZ tax.

Can you tie the fees paid to audiologists on a biannual review, based on the inflation index, as you do with other professions?

Question 2

A fully equipped audiology test room contains a minimum of \$120,000.00 of test and fitting systems/equipment.

Other Professions, e.g. Osteopathy or Psychology, do not require the same investment and ongoing replacement of necessary equipment as do the three technical plus Professions of Audiology, Dentistry and Optometry.

Can you group us together with Dentistry and Optometry given the comparable expense of both our training and our clinical practice and equipment requirements when you review fee structures?

Thank you for considering this.

Independent Audiologists NZ

9th December, 2019.